

# **Exhibit 2**

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SEMICONDUCTOR CORPORATION  
9

10 UNITED STATES DISTRICT COURT  
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION  
13

14 FAIRCHILD SEMICONDUCTOR  
CORPORATION,

15 Plaintiff,

16 v.

17 ALPHA AND OMEGA SEMICONDUCTOR  
18 INCORPORATED and ALPHA AND OMEGA  
SEMICONDUCTOR LIMITED,

19 Defendants.  
20  
21  
22

Case No. C 07-02664 JWS

**FAIRCHILD SEMICONDUCTOR  
CORPORATION'S FIRST SET OF  
REQUESTS FOR PRODUCTION TO  
ALPHA AND OMEGA  
SEMICONDUCTOR  
INCORPORATED AND ALPHA  
AND OMEGA SEMICONDUCTOR  
LIMITED**

23 Plaintiff Fairchild Semiconductor Corporation ("Fairchild") hereby requests pursuant to  
24 Rule 34 of the Rules of Civil Procedure that defendants Alpha and Omega Semiconductor  
25 Incorporated and Alpha and Omega Semiconductor Limited produce each of the following documents  
26 and tangible things within thirty (30) days from the date of service hereof, at the offices of Townsend  
27 and Townsend and Crew LLP, Two Embarcadero Center, 8<sup>th</sup> Floor, San Francisco, California 94111.  
28 ///

**A. DEFINITIONS**

1                   2.       The terms "AOS", "you" and "your" as used herein mean defendants Alpha and Omega  
2 Semiconductor Incorporated and Alpha and Omega Semiconductor Limited, and all predecessors,  
3 successors, subsidiaries, divisions, parents and/or affiliates thereof, past or present, and all past or  
4 present officers, directors, affiliates, agents, employees, attorneys, consultants, representatives and any  
5 other person acting or purporting to act on behalf of AOS.

6                   3.       The term "patents-in-suit" refers collectively to U.S. Patent Nos. 6,429,481, 6,710,406,  
7 6,521,497 and 6,828,195.

8                   4.       The term "accused product(s)" refers to any and all systems or products, including but  
9 not limited to modules, containing trench design power MOSFETs or IGBTs made, used, offered for  
10 sale, sold or imported into the United States by you, on your behalf or by any of your customers.

11                   5.       The terms "refer or relate to" shall mean constitute, consist of, refer, relate, summarize,  
12 demonstrate, reflect, evidence, contain, study, analyze, consider, explain, mention, show, discuss,  
13 embody, identify, state, describe, contradict, undermine, nullify or comment upon. Similarly, the term  
14 "referring or relating to" shall mean constituting, consisting of, referring, relating, summarizing,  
15 demonstrating, reflecting, evidencing, containing, studying, analyzing, considering, explaining,  
16 mentioning, showing, discussing, embodying, evidencing, identifying, stating, describing,  
17 contradicting, undermining, nullifying or commenting upon.

18                   6.       The term "document" shall be broadly construed as intended by the Federal Rules of  
19 Civil Procedure and shall include, but not be limited to, any written, printed, recorded or graphic  
20 matter, computer memory (including but not limited to hard drives, portable memory, laptops  
21 computers, FLASH memory devices, memory sticks, CDs and DVDs of any format, and optical  
22 memory devices), computer tapes and diskettes, tapes, films, photographs, drawings, or any other  
23 tangible thing by which information is contained, stored or displayed, of every kind or description,  
24 however produced or reproduced, whether or draft or final, original or reproduction, signed or  
25 unsigned, and regardless of whether approved, signed, sent, received, redrafted, or executed, including  
26 without limitation written and electronic communications, electronically stored information, electronic  
27 data, electronic files, letters, correspondence, notes, memoranda of telephone conversations or  
28

1 meetings, diaries, desk calendars, interoffice communications, fax messages, E-mail, telegrams, telex  
2 messages, records, studies, bills, receipts, checks, checkbooks, purchase orders, invoices, requisitions,  
3 studies, summaries, analyses, statistical and financial statements, charts, graphs, reports, computer  
4 printouts, laboratory notebooks, invention disclosure documents, patent applications and drafts  
5 thereof, test records, test reports, assignments, licenses, bills of sale, sale of business agreements,  
6 market studies, articles, publications, patents, manuals, magnetic tapes, tabulations, records, work  
7 papers, journals, microfiche, microfilm photographic film, surveys, forms, printed brochures or  
8 material similar to any of the foregoing, however denominated, by whomever prepared, and to  
9 whomever addressed, which are in your possession, custody or control or to which you have, have had  
10 or can obtain access.

11 6. The term "sale(s)", "sell" or "sold" shall include sales, licenses, leases loans,  
12 consignments, distribution to resellers or others and all other methods of product distribution whether  
13 direct or indirect and whether the produce is distributed singly or in combination with or as part of  
14 another product, and whether or not revenue was or will be received therefrom.

15 7. The term "person" means any natural person, firm, association, partnership,  
16 government agency, corporation, proprietorship, or other entity and its officers, directors, partners,  
17 employees, representatives and agents.

18 8. The term "third party" means anyone other than AOS or Fairchild.

19 9. The term "communication" means or refers to all discussions, conversations,  
20 negotiations, agreements, understandings, meetings, telephone conversations, letters, notes, telegrams,  
21 advertisements or other forms of information exchanged, whether oral, electronic or written.

22 10. The words "and" and "or" shall be construed conjunctively or disjunctively, whichever  
23 makes the request more inclusive.

24 11. Any pronouns shall be construed to refer to the masculine, feminine or neuter gender,  
25 in singular or plural, as in each case is most appropriate.

26 12. The words "all" and "any" shall be construed to mean "any and all."

27 13. The word "each" shall be construed to mean "each and every."

28 14. The singular form of any word shall be construed to also include the plural.

**B. INSTRUCTIONS**

1. Pursuant to Rule 34 of the Federal Rules of Civil Procedure, you are requested to respond within 30 days from the date of service of this request.

2. If you contend that any document requested to be produced is protected from discovery by the attorney-client privilege, work product doctrine, or any other ground of privilege or immunity, each such document shall be identified as follows:

- a. the date of the document;
- b. the name and title or position of the author(s) of the document;
- c. the name and title or position of all persons designated as addressees or otherwise as recipients of copies of the document;
- d. the subject matter of the document;
- e. the type of document (memorandum, letter, report, etc.)
- f. the specific grounds for withholding the document in sufficient detail for the Court to rule on the merits of the claim of attorney-client privilege, work product doctrine; or other ground of privilege or immunity; and
- g. the number of the document request(s) to which the document pertains.

3. In producing documents pursuant to this request, AOS shall indicate the specific request(s) in response to which each document or group of documents is being produced. If there are no documents in the possession, custody or control of AOS which are responsive to a request herein, AOS shall state that fact in its written response to such request(s).

4. Unless otherwise indicated, this request for production of documents seeks all documents existing or prepared through the present.

5. This request shall be deemed continuing so as to require prompt and further supplemental production if AOS obtains additional documents at any time between the time of the initial production and the time of hearing or trial.

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**C. DOCUMENT REQUESTS**

DOCUMENT REQUEST NO. 1:

All documents describing any aspect of the structure or design of any accused product, including without limitation plots of mask layers, cell plots, design drawings, electronic design automation files and starting material descriptions.

DOCUMENT REQUEST NO. 2:

All documents describing any aspect of the process of manufacture of any accused product, including without limitation process, flows, process travelers and process recipes.

DOCUMENT REQUEST NO. 3:

All documents describing the configuration of any accused product at any stage of its manufacture (including without limitation documents depicting the configuration of the semiconductor junctions and layers atop the silicon substrate and how those junction patterns and layers are/were formed).

DOCUMENT REQUEST NO. 4:

All documents describing the arrangements made for the manufacture of any accused products, including without limitation documents describing the place of wafer fabrication, the changes to the manufacturing process over time, and the shipment of wafers for assembly into accused products and eventual sale.

DOCUMENT REQUEST NO. 5:

Data books, catalogs, datasheets, application notes, instructional materials, product selector guides, application notes, designer's manual, web pages or other product literature referring or relating to any accused product.

DOCUMENT REQUEST NO. 6:

All travel logs, masks, process run cards, manufacturing specifications, manufacturing drawings, schematics, blueprints, drawings, sketches, design specifications, or flow charts referring or relating to the accused products.

DOCUMENT REQUEST NO. 7:

All documents and things, including but not limited to, photographs, micrographs or

1 prototypes that relate to or were referred to, examined or used in the design or development of the  
2 accused products.

3 DOCUMENT REQUEST NO. 8:

4 All documents and things that relate to the structure or design of the accused products.

5 DOCUMENT REQUEST NO. 9:

6 All documents and things that relate to or evidence modification(s) or improvement(s) to the  
7 accused products.

8 DOCUMENT REQUEST NO. 10:

9 All documents that relate to or evidence the contemplation of, the negotiation for, or the  
10 entering into of any patent or technology licenses or agreements with third parties relating to the  
11 accused products.

12 DOCUMENT REQUEST NO. 11:

13 All documents that relate to any investigation, report, opinion, study, or analysis (legal or  
14 otherwise) whether formal or informal concerning, discussing or relating to any potential or alleged  
15 infringement of one or more of the patents-in-suit or any claim thereof.

16 DOCUMENT REQUEST NO. 12:

17 Documents sufficient to describe the corporate relationship between Alpha and Omega  
18 Semiconductor Incorporated and Alpha and Omega Semiconductor Limited.

19 DOCUMENT REQUEST NO. 13:

20 Documents sufficient to describe the corporate structure of AOS.

21 DOCUMENT REQUEST NO. 14:

22 All documents that relate to company directories, organizational charts and similar documents  
23 sufficient to show names, locations (geographic or by department or division) and reporting lines of all  
24 AOS officers, directors or employees who may have had knowledge concerning AOS's design,  
25 development, manufacture, production, marketing, distribution, importation, offers for sale and/or sale  
26 of any of the accused products.

27 DOCUMENT REQUEST NO. 15:

28 All documents that relate to AOS's marketing and sales in the United States of any of the

1 accused products from May 2001 to the present (including but not limited to marketing and business  
2 plans).

3 DOCUMENT REQUEST NO. 16:

4 All documents reflecting any sales of any accused product in the United States, including  
5 without limitation all customer lists and periodic sales reports for such products from May 2001 to the  
6 present.

7 DOCUMENT REQUEST NO. 17:

8 All documents that relate to agreements with any third party, including but not limited to  
9 distributors or resellers, that imports, promotes, markets, sells, offers to sell or uses the accused  
10 products.

11 DOCUMENT REQUEST NO. 18:

12 Documents sufficient to identify each person that makes the accused products for you or on  
13 your behalf.

14 DOCUMENT REQUEST NO. 19:

15 Documents sufficient to identify each person that makes any system, product, or module that  
16 incorporates any of the accused products.

17 DOCUMENT REQUEST NO. 20:

18 Documents sufficient to identify each person that uses, sells, offers for sale or imports into the  
19 United States any system, product, or module that incorporates any of the accused products.

20 DOCUMENT REQUEST NO. 21:

21 All documents that relate to any comparisons between the accused products and any product  
22 made or sold by Fairchild.

23 DOCUMENT REQUEST NO. 22:

24 All documents and things you identified and/or were requested to identify in your answers to  
25 Fairchild's First Set of Interrogatories.



1 DATED: July 27, 2007

Respectfully submitted,

2  
3 By: 

Eric P. Jacobs

Peter H. Goldsmith

Robert A. McFarlane

Igor Shoiket

TOWNSEND AND TOWNSEND AND CREW LLP

Two Embarcadero Center, 8th Floor

San Francisco, California 94111

Telephone: (415) 576-0200

Facsimile: (415) 576-0300

Attorneys for Plaintiff

FAIRCHILD SEMICONDUCTOR CORPORATION

10 61100788 v3

**CERTIFICATE OF SERVICE**

[C.C.P. §§ 1011 and 1013, C.R.C. § 2008, F.R.C.P. Rule 5, F.R.A.P. 25]

I declare that I am employed in the City and County of San Francisco, California; I am over the age of 18 years and not a party to the within action; my business address is Two Embarcadero Center, Eighth Floor, San Francisco, California, 94111. On the date set forth below, I served a true and accurate copy of the document(s) entitled:

**PLAINTIFF FAIRCHILD SEMICONDUCTOR CORPORATION'S FIRST SET OF REQUESTS FOR PRODUCTION TO DEFENDANTS**

on the party(ies) in this action by placing said copy(ies) in a sealed envelope each addressed as follows:

**BY MAIL**

Andrew J. Wu  
Morgan Lewis & Bockius LLP  
2 Palo Alto Square  
3000 El Camino Real, Suite 700  
Palo Alto, CA 94306  
Tel: 650-843-4000  
Fax: 650-843-4001  
Email: awu@morganlewis.com

*Attorneys for Defendants*

**BY HAND**

Daniel Johnson, Jr.  
Rita E. Tautkus  
Morgan Lewis & Bockius LLP  
One Market Street, Spear Street Tower  
San Francisco, CA 94105-1126  
Tel: 415-442-1000  
Fax: 415-442-1001  
Email: djjohnson@morganlewis.com  
Email: rtautkus@morganlewis.com

*Attorneys for Defendants*

☒ [By First Class Mail] I am readily familiar with my employer's practice for collecting and processing documents for mailing with the United States Postal Service. On the date listed herein, following ordinary business practice, I served the within document(s) at my place of business, by placing a true copy thereof, enclosed in a sealed envelope, with postage thereon fully prepaid, for collection and mailing with the United States Postal Service where it would be deposited with the United States Postal Service that same day in the ordinary course of business.

☐ [By Overnight Courier] I caused each envelope to be delivered by a commercial carrier service for overnight delivery to the offices of the addressee(s).

☒ [By Hand] I directed each envelope to the party(ies) so designated on the service list to be delivered by courier this date.

☐ [By Facsimile Transmission] I caused said document to be sent by facsimile transmission to the fax number indicated for the party(ies) listed above.

☐ [By Electronic Transmission] I caused said document to be sent by electronic transmission to the e-mail address(es) indicated for the party(ies) listed above.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this date at San Francisco, California.

Dated: July 27, 2007.

  
\_\_\_\_\_  
Esther Casillas

61100788 v3

# **Exhibit 3**

1 MORGAN, LEWIS & BOCKIUS LLP  
2 DANIEL JOHNSON, JR., State Bar No. 57409  
3 BRETT M. SCHUMAN, State Bar No. 189247  
4 **MORGAN, LEWIS & BOCKIUS LLP**  
5 One Market, Spear Street Tower  
San Francisco, CA 94105-1126  
6 Tel: 415.442.1000  
7 Fax: 415.442.1001  
8 E-mail: djjohnson@morganlewis.com

9 ANDREW J. WU, State Bar No. 214442  
10 AHREN C. HOFFMAN (State Bar No. 250469)  
11 **MORGAN, LEWIS & BOCKIUS LLP**  
12 2 Palo Alto Square  
3000 El Camino Real, Suite 700  
Palo Alto, CA 94306  
Tel: 650.843.4000  
Fax: 650.843.4001  
E-mail: awu@morganlewis.com

11 Attorneys for Plaintiffs and Counterdefendants  
12 ALPHA & OMEGA SEMICONDUCTOR, INC.  
ALPHA & OMEGA SEMICONDUCTOR, LTD.

13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
15 SAN FRANCISCO DIVISION  
16

17 ALPHA & OMEGA SEMICONDUCTOR,  
18 INC. a California corporation; and ALPHA  
19 & OMEGA SEMICONDUCTOR, LTD., a  
Bermuda corporation,

20 Plaintiffs and  
21 Counterdefendants,

22 vs.

23 FAIRCHILD SEMICONDUCTOR  
CORP., a Delaware corporation,

24 Defendant and  
25 Counterclaimant.

Case No. C 07-2638 JSW  
(Consolidated with Case No. C-07-2664 JSW)

**AOS'S RESPONSES AND OBJECTIONS  
TO FAIRCHILD'S FIRST SET OF  
REQUESTS FOR PRODUCTION SERVED  
IN CASE NO. C 07-2664 JSW**

26 Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiffs and  
27 Counterdefendants Alpha & Omega Semiconductor, Ltd. and Alpha & Omega Semiconductor,  
28

1 Inc. (collectively "AOS") hereby respond to the First Set of Requests for Production ("Requests")  
 2 propounded by Defendant and Counterclaimant Fairchild Semiconductor Corp. ("Fairchild") in  
 3 Case No. 07-02664 JSW, averring as follows:

4 **GENERAL OBJECTIONS**

5 1. AOS generally objects to the Requests to the extent they seek documents and  
 6 things subject to the attorney-client privilege and/or work-product doctrine, or any other privilege  
 7 or protection afforded by law. Any inadvertent production of any document or thing shall not  
 8 constitute a waiver of any privileges of AOS, and AOS reserves its rights to demand and obtain  
 9 the return of any such document or thing, and all copies thereof. AOS further objects to the  
 10 Requests to the extent they require AOS to search for and reveal privileged information,  
 11 documents, and things from its and its attorneys' files. AOS will not schedule on a privilege log  
 12 any materials protected by the attorney-client privilege and/or work-product doctrine created on  
 13 or after May 17, 2007, the date this lawsuit was initiated. As used herein, the term "non-  
 14 privileged" refers to information, documents, and things that are not protected by the attorney-  
 15 client privilege, the work-product doctrine, or any other applicable privilege or protection from  
 16 discovery.

17 2. AOS generally objects to the Requests to the extent they seek to impose upon AOS  
 18 obligations different from, or in addition to, those obligations imposed by the Federal Rules of  
 19 Civil Procedure, the Civil Local Rules or the Patent Local Rules of the Northern District of  
 20 California, or any Orders of the Court. AOS' responses shall be controlled by the requirements  
 21 imposed by the Federal Rules of Civil Procedure, Federal Rules of Evidence, the applicable Local  
 22 Rules, and Orders of the Court.

23 3. AOS objects to Fairchild's definitions of "AOS," "you," and "your" as vague,  
 24 ambiguous, overly broad, and unduly burdensome to the extent they seek to make the Requests  
 25 apply to, and seek information, documents, or things from, persons or entities other than, or  
 26 beyond the control of, Alpha & Omega Semiconductor, Ltd. or Alpha & Omega Semiconductor,  
 27 Inc. Subject to its general and specific objections, AOS shall base its answers to the Requests  
 28

solely on information, documents, or things that are in the custody, possession, or control of Alpha & Omega Semiconductor, Ltd. or Alpha & Omega Semiconductor, Inc.

4. AOS objects to Fairchild's definition of "accused product(s)" as overly broad. As Fairchild has defined the term, it purports to encompass each and every trench MOSFET product that AOS has ever made, used, offered for sale, sold or imported. AOS will treat this term as referring to the following trench MOSFET products that were identified by Fairchild in a letter dated August 3, 2005, from Stephen Schott to Dr. Michael Chang: AO4812, AO4912, AOD412, AOD414, AOD404, AOD406, AO4407, and AO4422.

5. AOS objects to Fairchild's Instruction No. 2 as overly broad and unduly burdensome to the extent it seeks to impose obligations different from, or in addition to, the obligations imposed by Rule 26(b)(5) of the Federal Rules of Civil Procedure. Accordingly, AOS shall comply with Rule 26(b)(5) with respect to any documents requested to be produced that are withheld on the grounds that they are subject to the attorney-client privilege and/or work-product doctrine, or any other privilege or protection afforded by law. Furthermore, as stated in General Objection No. 1, AOS will not schedule on a privilege log any materials protected by the attorney-client privilege or work-product doctrine created on or after May 17, 2007, the date this lawsuit was initiated.

6. AOS objects to Fairchild's Instruction No. 3 as unduly burdensome to the extent it seeks to limit the manner in which documents may be produced.

## RESPONSES

### REQUEST FOR PRODUCTION NO. 1:

All documents describing any aspect of the structure or design of any accused product, including without limitation plots of mask layers, cell plots, design drawings, electronic design automation files and starting material descriptions.

### RESPONSE TO REQUEST FOR DOCUMENT NO. 1:

AOS incorporates by this reference its General Objections. AOS further objects to this request as overly broad, vague, ambiguous, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving its objections, AOS

1 will produce non-privileged documents responsive to this request sufficient to show the technical  
2 design and operation of the accused products.

3 **REQUEST FOR DOCUMENT NO. 2:**

4 All documents describing any aspect of the process of manufacture of any accused  
5 product, including without limitation process, flows, process travelers and process recipes.

6 **RESPONSE TO REQUEST FOR DOCUMENT NO. 2:**

7 AOS incorporates by this reference its General Objections. AOS further objects to this  
8 request as overly broad, vague, ambiguous, unduly burdensome, and not reasonably calculated to  
9 lead to the discovery of admissible evidence. Subject to and without waiving its objections, AOS  
10 will produce non-privileged documents responsive to this request sufficient to describe the  
11 manufacture of the accused products.

12 **REQUEST FOR DOCUMENT NO. 3:**

13 All documents describing the configuration of any accused product at any stage of its  
14 manufacture (including without limitation documents depicting the configuration of the  
15 semiconductor junctions and layers atop the silicon substrate and how those junction patterns and  
16 layers are/were formed).

17 **RESPONSE TO REQUEST FOR DOCUMENT NO. 3:**

18 AOS incorporates by this reference its General Objections. AOS further objects to this  
19 request as overly broad, vague, ambiguous, unduly burdensome, and not reasonably calculated to  
20 lead to the discovery of admissible evidence. AOS further objects that the undefined term  
21 "configuration," as used in this request, is vague, ambiguous and unintelligible. Subject to and  
22 without waiving its objections, AOS will produce non-privileged documents responsive to this  
23 request sufficient to describe the manufacture of the accused products.

24 **REQUEST FOR DOCUMENT NO. 4:**

25 All documents describing the arrangements made for the manufacture of any accused  
26 products, including without limitation documents describing the place of wafer fabrication, the  
27 changes to the manufacturing process over time, and the shipment of wafers for assembly into  
28 accused products and eventual sale.

**RESPONSE TO REQUEST FOR DOCUMENT NO. 4:**

AOS incorporates by this reference its General Objections. AOS further objects to this request as overly broad, vague, ambiguous, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving its objections, AOS will produce non-privileged documents responsive to this request sufficient to describe the manufacture of the accused products.

**REQUEST FOR DOCUMENT NO. 5:**

Data books, catalogs, datasheets, application notes, instructional materials, product selector guides, application notes, designer's manual, web pages or other product literature referring or relating to any accused product.

**RESPONSE TO REQUEST FOR DOCUMENT NO. 5:**

AOS incorporates by this reference its General Objections. AOS further objects to this request as overly broad, vague, ambiguous, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving its objections, AOS will produce non-privileged documents responsive to this request sufficient to show the technical operation of the accused products.

**REQUEST FOR DOCUMENT NO. 6:**

All travel logs, masks, process run cards, manufacturing specifications, manufacturing drawings, schematics, blueprints, drawings, sketches, design specifications, or flow charts referring or relating to the accused products.

**RESPONSE TO REQUEST FOR DOCUMENT NO. 6:**

AOS incorporates by this reference its General Objections. AOS further objects to this request as overly broad, vague, ambiguous, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving its objections, AOS will produce non-privileged documents responsive to this request sufficient to show the manufacturing process of the accused products.

**REQUEST FOR DOCUMENT NO. 7:**

All documents and things, including but not limited to, photographs, micrographs or



1 prototypes that relate to or were referred to, examined or used in the design or development of the  
2 accused products.

3 **RESPONSE TO REQUEST FOR DOCUMENT NO. 7:**

4 AOS incorporates by this reference its General Objections. AOS further objects to this  
5 request as overly broad, vague, ambiguous, unduly burdensome, and not reasonably calculated to  
6 lead to the discovery of admissible evidence. Subject to and without waiving its objections, AOS  
7 will produce non-privileged documents responsive to this request sufficient to show the design  
8 and development of the accused products.

9 **REQUEST FOR DOCUMENT NO. 8:**

10 All documents and things that relate to the structure or design of the accused products.

11 **RESPONSE TO REQUEST FOR DOCUMENT NO. 8:**

12 AOS incorporates by this reference its General Objections. AOS further objects to this  
13 request as overly broad, vague, ambiguous, unduly burdensome, and not reasonably calculated to  
14 lead to the discovery of admissible evidence. Subject to and without waiving its objections, AOS  
15 will produce non-privileged documents responsive to this request sufficient to show the structure  
16 and design of the accused products.

17 **REQUEST FOR DOCUMENT NO. 9:**

18 All documents and things that relate to or evidence modification(s) or improvement(s) to  
19 the accused products.

20 **RESPONSE TO REQUEST FOR DOCUMENT NO. 9:**

21 AOS incorporates by this reference its General Objections. AOS further objects to this  
22 request as overly broad, vague, ambiguous, unduly burdensome, and not reasonably calculated to  
23 lead to the discovery of admissible evidence. Subject to and without waiving its objections, AOS  
24 will produce non-privileged documents responsive to this request sufficient to show the technical  
25 design of the accused products.

26 **REQUEST FOR DOCUMENT NO. 10:**

27 All documents that relate to or evidence the contemplation of, the negotiation for, or the  
28 entering into of any patent or technology licenses or agreements with third parties relating to the

1 accused products.

2 **RESPONSE TO REQUEST FOR DOCUMENT NO. 10:**

3 Pursuant to the parties' stipulation, AOS reserves its right to object and respond to this  
4 request at a later time.

5 **REQUEST FOR DOCUMENT NO. 11:**

6 All documents that relate to any investigation, report, opinion, study, or analysis (legal or  
7 otherwise) whether formal or informal concerning, discussing or relating to any potential or  
8 alleged infringement of one or more of the patents-in-suit or any claim thereof.

9 **RESPONSE TO REQUEST FOR DOCUMENT NO. 11:**

10 Pursuant to the parties' stipulation, AOS reserves its right to object and respond to this  
11 request at a later time.

12 **REQUEST FOR DOCUMENT NO. 12:**

13 Documents sufficient to describe the corporate relationship between Alpha and Omega  
14 Semiconductor Incorporated and Alpha and Omega Semiconductor Limited.

15 **RESPONSE TO REQUEST FOR DOCUMENT NO. 12:**

16 AOS incorporates by this reference its General Objections. AOS objects further on the  
17 grounds that the term "corporate relationship" is vague and ambiguous. Subject to and without  
18 waiving its objections, AOS will produce documents sufficient to show that Alpha and Omega  
19 Semiconductor Incorporated is a wholly owned subsidiary of Alpha and Omega Semiconductor  
20 Limited.

21 **REQUEST FOR DOCUMENT NO. 13:**

22 Documents sufficient to describe the corporate structure of AOS

23 **RESPONSE TO REQUEST FOR DOCUMENT NO. 13:**

24 AOS incorporates by this reference its General Objections. AOS objects further on the  
25 grounds that the term "corporate structure" is vague and ambiguous. Subject to and without  
26 waiving its objections, AOS will produce documents sufficient to show that Alpha and Omega  
27 Semiconductor Incorporated is a wholly owned subsidiary of Alpha and Omega Semiconductor  
28 Limited.

**REQUEST FOR DOCUMENT NO. 14:**

All documents that relate to company directories, organizational charts and similar documents sufficient to show names, locations (geographic or by department or division) and reporting lines of all AOS officers, directors or employees who may have had knowledge concerning AOS's design, development, manufacture, production, marketing, distribution, importation, offers for sale and/or sale of any of the accused products.

**RESPONSE TO REQUEST FOR DOCUMENT NO. 14:**

AOS incorporates by this reference its General Objections. Subject to and without waiving its objections, AOS will produce non-privileged documents responsive to this request sufficient to identify the officers, directors, or employees of AOS who have knowledge of the technical design, manufacture, and operation of the accused products.

**REQUEST FOR DOCUMENT NO. 15:**

All documents that relate to AOS's marketing and sales in the United States of any of the accused products from May 2001 to the present (including but not limited to marketing and business plans).

**RESPONSE TO REQUEST FOR DOCUMENT NO. 15:**

Pursuant to the parties' stipulation, AOS reserves its right to object and respond to this request at a later time.

**REQUEST FOR DOCUMENT NO. 16:**

All documents reflecting any sales of any accused product in the United States, including without limitation all customer lists and periodic sales reports for such products from May 2001 to the present.

**RESPONSE TO REQUEST FOR DOCUMENT NO. 16:**

Pursuant to the parties' stipulation, AOS reserves its right to object and respond to this request at a later time.

**REQUEST FOR DOCUMENT NO. 17:**

All documents that relate to agreements with any third party, including but not limited to distributors or resellers, that imports, promotes, markets, sells, offers to sell or uses the accused

1 products.

2 **RESPONSE TO REQUEST FOR DOCUMENT NO. 17:**

3 Pursuant to the parties' stipulation, AOS reserves its right to object and respond to this  
4 request at a later time.

5 **REQUEST FOR DOCUMENT NO. 18:**

6 Documents sufficient to identify each person that makes the accused products for you or  
7 on your behalf.

8 **RESPONSE TO REQUEST FOR DOCUMENT NO. 18:**

9 AOS incorporates by this reference its General Objections. AOS further objects to this  
10 request as overly broad, vague, ambiguous, unduly burdensome, and not reasonably calculated to  
11 lead to the discovery of admissible evidence. AOS objects further to the extent this request  
12 purports to require that AOS produce documents it is obligated to keep confidential. Subject to  
13 and without waiving its objections, AOS refers Fairchild to its response to Interrogatory No. 1 in  
14 Case No. C 07-2664.

15 **REQUEST FOR DOCUMENT NO. 19:**

16 Documents sufficient to identify each person that makes any system, product, or module  
17 that incorporates any of the accused products.

18 **RESPONSE TO REQUEST FOR DOCUMENT NO. 19:**

19 AOS incorporates by this reference its General Objections. AOS objects further on the  
20 ground that this request is overly broad, vague, ambiguous, unduly burdensome, and not  
21 reasonably calculated to lead to the discovery of admissible evidence. AOS further objects to this  
22 request to the extent it seeks documents and things containing information that AOS is obligated  
23 to keep confidential pursuant to an agreement or agreements with a third party or parties. Subject  
24 to and without waiving its objections, AOS refers Fairchild to its response to Interrogatory No. 9  
25 in Case No. C 07-2664.

26 **REQUEST FOR DOCUMENT NO. 20:**

27 Documents sufficient to identify each person that uses, sells, offers for sale or imports into  
28 the United States any system, product, or module that incorporates any of the accused products.

**RESPONSE TO REQUEST FOR DOCUMENT NO. 20:**

AOS incorporates by this reference its General Objections. AOS objects further on the ground that this request is overly broad, vague, ambiguous, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. AOS further objects to this request to the extent it seeks documents and things containing information that AOS is obligated to keep confidential pursuant to an agreement or agreements with a third party or parties. Subject to and without waiving its objections, AOS refers Fairchild to its response to Interrogatory No. 9 in Case No. C 07-2664.

**REQUEST FOR DOCUMENT NO. 21:**

All documents that relate to any comparisons between the accused products and any product made or sold by Fairchild.

**RESPONSE TO REQUEST FOR DOCUMENT NO. 21:**

AOS incorporates by this reference its General Objections. AOS further objects to this request as overly broad, vague, ambiguous, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. AOS further objects to this request as premature under the Patent Local Rules. Subject to and without waiving its objections, AOS will produce all non-privileged responsive documents responsive to this request.

**REQUEST FOR DOCUMENT NO. 22:**

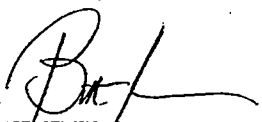
All documents and things you identified and/or were requested to identify in your answers to Fairchild's First Set of Interrogatories.

**RESPONSE TO REQUEST FOR DOCUMENT NO. 22:**

AOS incorporates by this reference its General Objections. AOS further objects to this request as overly broad, vague, ambiguous, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving its objections, AOS will produce the non-privileged and responsive documents it has agreed to produce in response to Fairchild's interrogatories and other document requests.

1 Dated: September 28, 2007

MORGAN, LEWIS & BOCKIUS LLP

2  
3 By   
4 Brett M. Schuman.

5 Attorneys for Plaintiffs and  
6 Counterdefendants  
7 Alpha & Omega Semiconductor, Inc.  
8 Alpha & Omega Semiconductor, Ltd.  
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